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**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

NEBYOU SOLOMON, an individual,

Case No.: 2:19-cv-00652-JAD-DJA

Plaintiff,

vs.

LAS VEGAS METROPOLITAN POLICE  
DEPARTMENT; JOSEPH LOMBARDO,  
individually and in his official capacity as  
Sheriff; JOHN L. PELLETIER, an  
individual; RICHARD E. MAUPIN, an  
individual; RYAN J. FRYMAN, an  
individual; JUAN D. CONTRERAS, an  
individual; ALLEN J. PAVESE, an  
individual; BRANDON M. MEADS, an  
individual; DOES I – V, individuals,

Defendants.

**STIPULATION AND ORDER TO  
EXTEND PLAINTIFF'S DEADLINE  
TO FILE RESPONSE TO  
DISPOSITIVE MOTION**

**(SECOND REQUEST) [ECF No. 121]**

Plaintiff NEBYOU SOLOMON, and Defendants LAS VEGAS METROPOLITAN  
POLICE DEPARTMENT, JOSEPH LOMBARDO, JOHN L. PELLETIER, RICHARD E.  
MAUPIN, RYAN J. FRYMAN, JUAN D. CONTRERAS, ALLEN J. PAVESE, and  
BRANDON M. MEADS (collectively “Parties”) by and through their respective counsel,  
hereby stipulate to the following:

1. The Parties hereby agree and stipulate to that Plaintiff NEBYOU  
SOLOMON shall have an additional fourteen (14) days to file his Response in Opposition to  
LVMPD Defendants’ Motion for Partial Summary Judgment (ECF No. 118) filed on October

1 18, 2021.

2       2. The current Response deadline is November 22, 2021, (*see* ECF No. 121)  
3 and the requested extension would make the new deadline be December 6, 2021.

4       3. This extension of time is necessary to because counsel for Plaintiff has  
5 several different competing deadlines, such as a response to a motion for preliminary  
6 injunction due on November 22, 2021, in the Eighth Judicial District Court of Nevada.  
7 Additionally, Ms. McLetchie is recovering from a medical issue.

8       4. This is the second stipulation for an extension of time in this matter and the  
9 requested additional time to is ensure proper representation of the Parties' interests and  
10 quality briefing.<sup>1</sup>

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28 <sup>1</sup> The deadline to file motions for summary judgment was also previously extended.

1       5. This request is made in good faith and is not sought for any improper  
2 purpose or for the purpose of delay.

3       **IT IS SO STIPULATED.**

4       DATED this 18<sup>th</sup> day of November, 2021.

5       **MCLEITCHIE LAW**

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7       /s/ *Leo S. Wolpert*  
8       Margaret A. McLetchie, NBN 10931  
9       Leo S. Wolpert, NBN 12658  
10       602 South Tenth Street  
11       Las Vegas, NV 89101  
12       *Attorneys of Plaintiff Nebyou Solomon*

5       DATED this 18<sup>th</sup> day of November, 2021.

6       **MARQUIS AURBACH COFFING**

7       \_\_\_\_\_  
8       /s/ *Nichols D. Crosby*  
9       Nicholas D. Crosby, NBN 8996  
10       10001 Park Run Drive  
11       Las Vegas, Nevada 89145  
12       *Attorney for Defendants Las Vegas*  
13       *Metropolitan Police Department; Joseph*  
14       *Lombardo; John L. Pelletier; Richard E.*  
15       *Maupin; Ryan J. Fryman; Juan D.*  
16       *Contreras; Allen J. Pavese; and Brandon*  
17       *M. Meads*

13       **ORDER**

14       **IT IS SO ORDERED.**

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17       U.S. District Judge Jennifer A. Dorsey  
18       Dated: November 22, 2021

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